



**Environmental  
Protection Agency**

Joseph R. Blawie, **Governor**  
Ted Strickland, **Lt. Governor**  
Scott M. Smith, **Director**

September 4, 2012

Ralph Fast  
City of Washington Court House  
1210 South Elm Street  
Washington Court House, Ohio 43160

**Re: City of Washington Court House  
Municipal Storm Water  
Annual Report Review – 2011  
Facility Permit No: 4GQ00027\*BG**

Dear Mr. Fast:

On March 12, 2012, Ohio EPA received a copy of the annual report required by the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Small Municipal Separate Storm Sewer Systems (MS4s) #OHQ000002. Upon review, Ohio EPA has determined the following:

The annual report for reporting year 2011 is incomplete. In particular, the annual report does not provide the following information:

- A Table of Organization identifying the name and contact information for the party responsible for overall management and implementation of your program and each of the six minimum control measures (MCMs). The Table of Organization is a graphical representation of how implementation of your MS4 program occurs across multiple positions, agencies and departments. Please specify the lines of communication between the parties involved in implementation of your MS4 program. Guidance on developing a table of organization can be found on our website at <http://www.epa.ohio.gov/Default.aspx?tabid=2697>.
- If Washington Court House uses any third parties to conduct all or part of the MCM program, please provide a current, signed copy of the Memorandums of Understanding (MOUs) between the City of Washington Court House and any third parties.
- An attachment that identifies the construction sites within your jurisdiction that are subject to storm water pollution prevention plan (SWP3) review and site inspection. Identify construction start and end dates, as appropriate, and the NPDES facility permit number of each construction activity listed. For subdivided development, please provide a list of individual lots within the development, either by address or subplot number, upon which construction occurred during this reporting period, e.g., individual home building lots within a residential subdivision. Provide an indication as to whether or not your program includes inspection of individual lot construction.

- A list of municipal facilities subject to the pollution prevention good housekeeping program.

Further, upon review of the annual report, it appears that Washington Court House has not enacted the following ordinances or resolutions, or met the following NPDES permit requirements. Due to your status as an Appendix 7 community, these items are required to be completed either by the end of your first permit term (IDEE and Employee Training) or within 2 years of NPDES permit renewal (Construction and Post-Construction):

- **Illicit Discharge Detection and Elimination** – Your report indicated that an ordinance concerning IDDE has not yet been enacted. Failure to enact an ordinance or resolution to prohibit illicit discharges into your municipal separate storm sewer system by the end of your first permit term will be a violation of Part III.B.3.d of the NPDES permit.
- **Construction Site Runoff Control** – Your report indicated that an ordinance concerning Construction Site Runoff Control has not yet been enacted. Failure to enact an ordinance or resolution to prohibit illicit discharges into your municipal separate storm sewer system by the end of the second year of your renewal permit term will be a violation of Part III.B.3.d of the NPDES permit.
- **Post-Construction Storm Water Management** – Your report indicated that an ordinance concerning Post Construction Storm Water Management has not yet been enacted. Failure to enact an ordinance or resolution to prohibit illicit discharges into your municipal separate storm sewer system by the end of the second year of your renewal permit term will be a violation of Part III.B.3.d of the NPDES permit.
- **Employee Training on Pollution Prevention & Good Housekeeping Practices** – It was not clear from your report whether any employee training occurred during the reporting period. Please be aware that the NPDES permit requires employee training on storm water pollution prevention practices on an annual basis. As an Appendix 7 community, you have until the end of your initial permit term to initiate this yearly training. After that time, failure to conduct employee training during the reporting period will constitute a violation of Part III.B.6.e of the NPDES permit.
- **Development of an SWP3 for Municipal Operations** – Washington Court House does not indicate that they have developed an SWP3 for municipal facilities subject to industrial storm water permitting or for municipal facilities where operations described in 40 CFR Part 122.26(b)(14) occur. Please be aware that the NPDES permit requires SWP3s to be developed and implemented at these facilities within 2 years of NPDES permit renewal. Failure to do so will be a violation of Part III.B.6.c of the NPDES permit.

Please be aware that failure to comply with the NPDES permit is a violation of Ohio Revised Code 6111.07 and is subject to penalties.

Finally, the annual report indicates the following possible areas of non-compliance with performance standards contained within the NPDES permit:

- **Mapping of MS4** – Please be aware that mapping of outfalls is to be completed by end of your initial NPDES permit coverage. Mapping of the rest of the system must be completed within 5 years of NPDES permit renewal. Mapping is to include catch basins, pipes, ditches, flood control facilities, all publicly-owned post-construction water quality BMPs and those private post-construction water quality BMPs installed to meet requirement of the Ohio EPA NPDES permit for construction activities and/or your local post-construction ordinance.
- **Mapping of Home Sewage Treatment Systems (HSTSSs)** – Washington Court House has not submitted a list of all HSTSSs within the UA that discharge to the MS4 and a storm sewer map showing their location. Please be aware that this list and map are to be completed within 5 years of your initial NPDES permit coverage.
- **Dry Weather Screening of MS4 Outfalls** – Washington Court House did not conduct any dry weather screening of MS4 outfalls during the reporting period. Please be aware that you must conduct dry weather screening of 100% of your outfalls by the end of your renewal NPDES permit term.

Please submit the items necessary to complete your annual report and, if violations or possible non-compliance are noted above, please provide me with a letter of response indicating the actions taken to correct these violations. For actions yet to be completed, provide me with a schedule by which corrective action will be complete. If we have incorrectly identified violations or areas of possible non-compliance, please provide a letter of explanation and documentation to support your position. Your response should be received no later than 14 days from the receipt of this letter.

If you have any questions, please contact me at 614-728-3844 or [Harry.Kallipolitis@epa.state.oh.us](mailto:Harry.Kallipolitis@epa.state.oh.us).

Sincerely,



Harry Kallipolitis  
Storm Water Coordinator  
Division of Surface Water  
Central District Office

c: City Council and Joseph J. Denen, City Manager of Washington Court House

ec: Jason Fyffe, DSW, CO